

Nossaman LLP
Allan H. Ickowitz (SBN 80994)
Robert S. McWhorter (SBN 226186)
445 S. Figueroa Street, 31st Floor
Los Angeles, California 90071
Telephone: 213.612.7800
Facsimile: 213.612.7801
aickowitz@nossaman.com
rmcwhorter@nossaman.com

Attorneys for Defendant,
Federal Deposit Insurance Corporation,
as Receiver of Corus Bank, N.A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

10 APR 15 PM 1:32
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

In re:

GTS 900 F, LLC,

Debtor,

GTS 900 F, LLC, a California limited
liability company,

Plaintiff,

v.

CORUS BANK, N.A., a national banking
association and DOES 1 through 10, inclusive,

Defendants.

Bankruptcy Case No. 2:09-bk-35127-VZ
Chapter 11

CV 10-02763 S/O

U.S. District Court Case No:
Bankruptcy Adv. No. 2:09-ap-02188-VZ

**NOTICE OF MOTION AND MOTION TO
WITHDRAW THE REFERENCE
PURSUANT TO 28 U.S.C. § 157(d) AND
BANKRUPTCY RULE 5011**

Date: May 17, 2010

Time: 10:00 AM

Place: Courtroom 1 - 2nd floor

Judge: S. JAMES OTERO

1 TO ALL PARTIES IN INTEREST:

2 PLEASE TAKE NOTICE that on May 17, 2010, at 10:00 AM, in Courtroom 1,

3 located at 312 N. Spring Street, Los Angeles, California, Defendant, Federal Deposit Insurance
4 Corporation in its capacity as receiver for Corus Bank, N.A ("FDIC-R"), will and hereby does move
5 this Court for an order withdrawing the reference to the Bankruptcy Court of this adversary proceeding
6 pursuant to 28 U.S.C. § 157(d) and Fed. R. Bank. P., Rule 5011. This Motion is made on the grounds
7 that (i) this case requires consideration of 12 U.S.C. § 1821, (ii) this matter is a non-core proceeding,
8 and (iii) good cause exists. Plaintiff, GTS 900 F, LLC concurs in the relief sought in this Motion.

9 This Motion will be based on this Notice of Motion, the accompanying Memorandum of Points
10 and Authorities, the Declaration of Robert S. McWhorter, the Request for Judicial Notice, the papers
11 and records on file herein, and such oral and documentary evidence as may be presented at the hearing
12 of the Motion.

13
14
15 Dated: April 12, 2010

NOSSAMAN LLP

16 By: 

17 ROBERT S. MCWHORTER

18 Attorneys for Defendant,
19 FEDERAL DEPOSIT INSURANCE CORPORATION AS
20 RECEIVER FOR CORUS BANK, N.A.